

EDEN P. QUANTON  
QUANTON LAW, PLLC  
2 PARK AVENUE, 20<sup>TH</sup> FLOOR  
NEW YORK, NY 10016

245 NASSAU STREET  
PRINCETON, NJ 08540

TELEPHONE (212) 419-0575; 609-356-0526  
CELL: (202) 360-6296  
EMAIL EQUANTON@GMAIL.COM

June 30, 2025

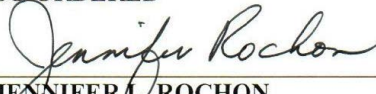
**VIA ECF**

Hon. Jennifer L. Rochon  
United States District Judge  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

The hearing on the motion to withdraw is adjourned to **July 8, 2025 at 3:00 p.m.** The hearing will still be held via Microsoft Teams, and the public listen-only line may be accessed by dialing 646-453-4442 | 86879193 #.

Date: June 30, 2025  
New York, New York

SO ORDERED

  
JENNIFER L. ROCHON  
United States District Judge

Re: GateGuard, Inc. v. MVI Systems, LLC et al., No. 19-cv-2472 (JLR)  
Request for Adjournment of Hearing on Motion to Withdraw

Dear Judge Rochon:

I represent Plaintiff GateGuard, Inc. in the above-captioned matter. I write respectfully to inform the Court of a law office error regarding the Court's June 24, 2025 Order scheduling a hearing on my motion to withdraw as counsel for July 1, 2025, at 10:00 a.m.

Pursuant to the Court's Order, I was directed to serve the Plaintiff with a copy of the Order and to ensure that Plaintiff submitted any response to the motion by Friday, June 27, 2025. Due to a scheduling oversight within my office, I regretfully failed to provide Plaintiff with the Court's Order in a timely manner. I realized the error last night and immediately informed the client, who instructed me to notify the Court without delay.

Accordingly, I respectfully request a one-week adjournment of the hearing currently scheduled for July 1, 2025, to allow Plaintiff adequate time to consider and respond to the motion. There are no pending deadlines in this matter, and counsel for Defendants has already consented to seek a 21-day stay of all proceedings. Thus, the requested adjournment would not prejudice any party and would serve the interests of fairness and due process.

I sincerely apologize to the Court for this oversight and appreciate Your Honor's understanding and continued courtesies.

Respectfully submitted,

/s/ Eden P. Quainton  
Eden P. Quainton  
*Counsel for Plaintiff GateGuard, Inc.*

cc: All Counsel of Record (via ECF)  
GateGuard, Inc. (via email)